IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

NAVIN BAROT, Plaintiff v. SUSQUEHANNA PHYSICIAN SERVICES d/b/a Susquehanna Health Medical Group, DIVINE PROVIDENCE HOSPITAL OF THE SISTERS OF CHRISTIAN CHARITY, SUSQUEHANNA HEALTH SYSTEM, and SUSQUEHANNA PHYSICIAN SERVICES, Defendants	:	Electronically Filed No. 4:14-CV-00673 (Judge Brann) Complaint Filed: April 8, 2014 Jury Trial Demanded

APPENDIX IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

VOLUME I

Defendants file this Appendix in Support of their Motion for Summary Judgment (the "Appendix"). The Appendix contains true and correct copies of the following described and indexed documents:

Index

Exhibit	**Document**
1.	Steve Johnson Deposition Transcripts (without exhibits) (June 24, 2015 and June 30, 2016)
	1-A Susquehanna Health Medical Group Employed Physician Compensation (D-286-D-288)
	1-B Susquehanna Health Medical Group Physician Compensation Plan (March 7, 2011) (D-26-D-48)
	1-C Letter from Steve Johnson to Dr. Barot dated May 17, 2010 (D-182)
	1-D SHMG Compensation Committee Meeting Minutes, March 10, 2011 (D-20-D-25)
2.	Jim Turri Deposition Transcript (June 24, 2015
	2-A Email from Jim Turri to Dr. McCauley and Ken Young, dated March 24, 2009 (D-61)
	2-B Email from Jim Turri re: Terms & Offer (D-64-D-66
	2-C Susquehanna Health Medical Group Physician Employment Agreement (D-1-D-15)
	2-D Email from Jim Turri to Navin Barot titled "Last Straw" (Barot 539)
	2-E Practice Review Minutes, April 13, 2010 (D-312-D-313)
	2-F Memo from Jim Turri to Dr. Barot dated December 2, 2010 re: Incentive Compensation due end of first contract year (July 2010) (D-241-D-242)
	2-G Email from Jim Turri to Dr. Barot re: Conscious Sedation (D-215)
	2-H SHMG Compensation Committee Meeting minutes May 12, 2011 (D-49-D-60)

3. William McCauley, M.D. Deposition Transcript (August 5, 2015) (without exhibits)

- 3-A Handwritten notes of 2/10/10 meeting (D-5352)
- 3-B Notes on March 12, 2010 meeting with Family Practice Residency program regarding Dr. Barot (D-5366)
- 3-C Notes of Meeting with Dr. Barot on November 1, 2010 (D-296-D-297)

4. Navin Barot, M.D. Deposition Transcripts (June 22, 2015 and June 23, 2015)

- 4-A Susquehanna Health System Medical Director of the Gastroenterology Program (D-4960-D-4964)
- 4-B Emails regarding compensation review (D-79-D-85
- 4-C Email from Jim Turri to Navin Barot re: RVU information (Barot 542)
- 4-D Minutes from Physician Practice Review, October 13, 2009 (D-298-D-299)
- 4-E Minutes from Practice Review, June 8, 2010 (D-317-319)
- 4-F Dr. Barot Meeting, June 11, 2010 (D-293-D-295)
- 4-G Handwritten notes from 6/11/10 meeting re: Dr. Barot (D-292)
- 4-H Dr. Barot Practice Plan June 11, 2010 (D-269-D-272)
- 4-I Gastroenterology Medical Director meeting with Dr. Barot (D-5081-D-5082)
- 4-J GI Service Line Meeting, August 4, 2010 (D-5869-D-5874)
- 4-K Email regarding prospective employment with Memorial Hospital in Gulfport, Mississippi (MHG00134-MHG00135)
- 4-L Email regarding five-year contract at Memorial Hospital (MHG00101)
- 4-M Email from Kent Nicaud to Navin Barot dated 12/28/2010 attaching letter of intent (MHG00126)
- 4-N Email from Dr. Baron to Kent Nicaud re: salary at SH (MHG00109)
- 4-O Practice Review, January 11, 2011 (D-324-D-325)
- 4-P Email re: WRVU (MHG00105-MHG00106)
- 4-Q Email from Dr. Barot to Kent Nicaud dated 1/19/2011 accepting employment (MHG00103-MHG00104).
- 4-R Practice Review, February 8, 2011 (D-326-D-327)
- 4-S MHG Employment Documents (MHG00051-MHG00057)

4-T Signed appointment application (MHG00092)
4-U Email from Dr. Barot to Kent Nicaud dated 2/22/2011 re: application (MHG00102)
4-V Letter from Christian Lovecchio to Stephen Johnson dated March7, 2011 re: Notice to Terminate Employment (D-5579-D-5581)
4-W Letter from Christian Lovecchio to Stephen Johnson dated March 9, 2011 re: Withdrawal of Notice to Terminate Employment (D-5582)
4-X Practice Review, March 8, 2011 (D-328)
4-Y Letter from Christian Lovecchio to Stephen Johnson dated April 15, 2011 re: Notice to Terminate Employment (D-5587-D-5589)
4-Z Employment Agreement with Memorial Hospital at Gulfport dated May 1, 2011 (MHG00004-MHG00027)
4-AA Letter from James Turri to Dr. Barot, dated May 31, 2011 denying request for further compensation about 90th percentile (D-237)

5. Neil Armstrong Deposition Transcript (June 30, 2016)

6. Lori Beucler Deposition Transcript (June 23, 2015)

6-A Notes from Endoscopy Meeting (D-5217)
6-B Notes re: Dr. Barot (D-5447-D5448)
6-C Gastroenterology Director Meeting Minutes, July 13, 2010 (D-205-D-206)

7. Brian Buttorff Deposition Transcript (August 4, 2015)

7-A Email from Marc Lovecchio to Ken Young re: Dr. Barot (D-90)
7-B Memo from Brian Buttorff to Dr. Barot dated May 2, 2011 re: Request for PTO and CME time off (D-6551-D-6561)
7-C Buttorff email to Dr. Barot re: PTO/CME request (D-223-D-224)

8. Ronald Reynolds Deposition Transcript (August 6, 2015)

    8-A Reynolds letter to Dr. Barot dated November 2, 2010 re: Notice of Intent to Terminate (D-19)

9. GI Medical Director Meeting Minutes, August 13, 2010 (D-4971-D-4972)

10. Ann Pepperman Deposition Transcript

11. James Douthat Deposition Transcript (October 7, 2016)